

Honorable Ricardo S. Martinez
Honorable David W. Christel

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

A.H., a minor,

Plaintiff

vs.

SNOHOMISH COUNTY and its SNOHOMISH
COUNTY SUPERIOR COURT, and the
SNOHOMISH COUNTY VGAL PROGRAM

Defendant

No. 2:20-cv-01665-RSM

STIPULATION AND ORDER
TO FILE EXHIBITS UNDER
SEAL

Noting Date: **APRIL 4, 2023**

I. STIPULATION

The parties, through counsel of record, agree as follows:

1. The parties will be filing responses to each other's Motions in Limine, which rely upon trial exhibits identified by the parties in their proposed pretrial order. Because the content of the exhibits are related to the underlying dependency, the parties stipulate that they should be filed with the Court under seal. Accordingly, the parties jointly move the court for an order permitting these exhibits to be filed under seal.

STIPULATION AND ORDER TO FILE EXHIBITS
UNDER SEAL - 1

KORNFELD TRUDELL BOWEN &
LINDQUIST, PLLC
4055 Lake Washington Blvd NE, Suite 240
Kirkland, Washington 98033
425.822-2200 Telephone
425.822-0783 Fax

2. The parties have conferred as required by LCR 5(g)(3)(A). The conference occurred telephonically and by email. The parties agree that because the documents were filed in the underlying dependency and contain confidential information, they need to be filed under seal in relation to responses to motions in limine.

3. RCW 13.50.100 limits the release of information obtained for use in child custody hearings. Consistent with these requirements, the documents filed in the underlying dependency matter should be filed under seal.

DATED this 3rd day of April, 2023.

KORNFELD TRUDELL BOWEN
& LINDQUIST, PLLC

LAW OFFICE OF MICHAEL WITHEY

/s/ Patrick A. Trudell
Patrick A. Trudell, WSBA #11363
Attorney for Plaintiff

/s/ Michael Withey
Michael Withey, WSBA No. 4787
Attorney for Plaintiff

KEATING, BUCKLIN & McCORMACK, INC.

/s/ Shannon Ragonesi, email authorization
Shannon Ragonesi, WSBA #31951
Audrey Airut Murphy, WSBA #56833
Attorneys for Defendants

ORDER

The Court has reviewed the Stipulation of the parties. Now, therefore, IT IS
HEREBY ORDERED that the stipulation is APPROVED.

STIPULATION AND ORDER TO FILE EXHIBITS
UNDER SEAL - 2

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1 It is further ORDERED that the exhibits identified in plaintiff's response to
2 defendant's Motions in Limine, are hereby SEALED.
3

4 DATED this 5th day of April, 2023.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

7 Presented by:

8 KORNFELD TRUDELL BOWEN
9 & LINDQUIST, PLLC

LAW OFFICE OF MICHAEL WITHEY

10 /s/ Patrick A. Trudell

11 Patrick A. Trudell, WSBA #11363
12 Attorney for Plaintiff

/s/ Michael Withey

Michael Withey, WSBA No. 4787
Attorney for Plaintiff

13 Copy Received, Approved as to Form:

14 KEATING, BUCKLIN & McCORMACK, INC.

16 /s/ Shannon Ragonesi, email authorization

17 Shannon Ragonesi, WSBA #31951
18 Audrey Airut Murphy, WSBA #56833
19 Attorneys for Defendants

28 STIPULATION AND ORDER TO FILE EXHIBITS
29 UNDER SEAL - 3

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CERTIFICATE OF MAILING

I hereby certify under the penalty of perjury under the laws of the State of Washington that on this day I delivered via mail, fax and/or legal messengers a copy of the foregoing document for delivery to the following:

Shannon M. Ragonesi
Audrey M. Airut Murphy
Keating, Bucklin & McCormack, Inc.
801 Second Avenue, Suite 1210
Seattle, WA 98104

DATED this 3rd day of April, 2023.

KORNFELD TRUDELL BOWEN
& LINDQUIST, PLLC

/s/ Barbara Faidley

Barbara Faidley